

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

1996-03-26

**PLAINTIFF'S FIRST REQUEST FOR ADMISSION
TO DEFENDANT JOHN CHAMBERS**

Plaintiff Anthony Bayad Pro Se and pursuant to Rule 36, Fed. R. Civ. P., hereby propound the following Request for Admission upon Defendant John Chambers to be responded to in accordance with said Rule, within the time prescribed by said Rule.

Dated: November 23, 2004

ANTHONY BAYAD, PRO SE
2 Magoun Avenue
Medford, MA 02155
Telephone (781) 704-8982

~~R.J.S.~~

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a true and correct copy of Plaintiff ' First Request for Admission to Defendant John Chambers was furnished via U.S. mail to : Bruce E. Falby, BBO #544143, PIPER RUDNICK LLP, One International Place, Boston MA 02110, this 23. day of November 2004 .

DEFINITIONS

As used herein, the following definitions apply:

- A. The term "you" and "your" shall refer to Defendant JOHN CHAMBERS, and/or his agent, employees, representatives and attorneys.
- B. "Bayad" shall refer to Plaintiff ANTHONY BAYAD.
- C. "Savastano" shall refer to Defendant ANTHONY SAVASTANO
- D. "Wiese" shall refer to Defendant CARL WIESE
- E. "Cisco" shall refer to CISCO SYSTEMS INC. and its employees, agents,& affiliates

INSTRUCTIONS

Within the time provided for in Rule 36, Fed. R. Civ. P., and in accordance with said Rule , you shall serve upon Plaintiff a written answer or objection addressed to each matter set forth below under "Request Admissions. " Every matter not responded to within the time provided for in Rule 36, Fed. R. Civ. P., is admitted. If objection is made, the reasons therefore shall be stated with specificity. The answer as to each matter shall specifically deny the matter or set forth in detail why the matter cannot be truthfully admitted or denied. A denial shall fairly meet the substance of the requested admission, and when good faith requires that you qualify an answer or deny only part of the matter of which an admission is requested, you shall specify so much of it as is true and qualify or deny the remainder.

REQUESTED ADMISSIONS

Please admit or deny:

1. That you and Savastano have worked at Wang Laboratories prior of joining Cisco. (Exhibit 1 attached)
2. That Bayad , Wiese, Savastano, and Amado Navas, and Dale Ronowski according to their Cisco personal records and Their Cisco employment Background , have worked for Lucent Technologies Prior of joining Cisco. (Exhibit 2 attached and please review Cisco personal record at you possession with Cisco)
3. That Exhibit 3 attached is a letter from Lucent Technologies signed, and dated **January 24th , 1997** by “Savastano”(now Cisco Vice President of Finance), executing the termination of Bayad ‘employment with Lucent Technologies.(Exhibit 3 attached)
4. That **Exhibit 4 attached contains 3 Letters** from the company International Network Services (prior of being acquired By Lucent Technologies): The 1st Letter was sent to Bayad and stating Bayad’ employment offer and dated July 21, 1997 with starting salary of 67,000.18 annualized; 2nd Letter dated July 30th and is also from INS and it is addressed to Bayad and stating his employment termination; and 3rd is also a letter from INS to Stephanie Alexander Esq., and it is in Reference to Bayad dated August 8, 1997, and state:” enclosed is all communication between International Network Services and Lucent Technologies”.(Exhibit 4 attached of the three letters including the communication of Savastano’ Lucent personal Secretary Johan Grohe).
5. That Bayad corresponded with you during his employment at Cisco , complaining of discrimination against your Cisco Vice President of Finance, by Emails and Cisco Mail on November 29, 2000 Subject of: Employment Discrimination and

Retaliation by Anthony Savastano Director of Finance, because **Savastano** placed his name in **NO-HIRE LIST**. (Exhibit 5 attached is copy of the letter from Bayad complaining about discrimination and retaliation).

6. That you and Savastano ‘reside in the State of California and work from Cisco Corporate’ office Building is SJ-10 and both are **on 5th Floor** located at 300 East Tasmania Drive, San Jose, CA 95134 , and “your” cube number 537 “and “Savasatano” cube number 558, and you hold a title of President of Cisco and Savasatano hold a title of Vice President of Finance. (Exhibit 6 attached.)

7. On about **November 4, 2000**, Cisco paid for Bayad’ travel expenses for one-to-one job interview for an SE position for North African region that was conducted at Cisco Dubai (United Arab Emirate), Cisco Paris (France), and Cisco London (England). (Exhibit 7 attached of US Immigration and Customs proof and British Airway’ travel records at your possession with Cisco corporate American Express Corporate Travel).

8. That your **Cisco director of Human Resources Celia Harper-Guerra** at ceharper@cisco .com, is responsible of updating the confidential and sensitive **CISCO NO-HIRING-LIST** (Exhibit 8 attached is an Electronic File of NO-HIRE-LIST please don’t destroy Evidence as you did before).

9. That you met with Bayad and his ‘Cisco client **KEY SPAN ENERGY INC.**, at Cisco New York located at ONE PENN PLAZA, 5TH Floor, NY, It ‘s on 34th St. and 8th Avenue, right across the street from Madison Square Garden of the Month of **August of 2000** . (Exhibit 9 attached and if we have to, we will subpoena the client travel log and expenses including yours).

10. That month of August the year of 2000 Bayad also was at Cisco New York Located One Penn Plaza , 5th Floor, NY and met with you and he complained personally to you about Discrimination by your Director of Finance Savastano .(Exhibit 10 attached)

11. That you conducted a mandatory town meeting with Cisco Employees in Massachusetts April the year 2001, Bayad was invited to the meeting and you saw him you ran away from him , avoiding him at all means in order not to meet with him during your town meeting in Massachusetts.(See your Cisco private plane logs at Hansom Air field Airport and Cisco Travel Expenses for the Month March April 2001).

12. That Bayad ‘ termination was effective May 1, 2001 with subject approval to be binding on Cisco must be signed personally by Kate Dcamp your Vice President, Human Resources. (Exhibit 12 Attached , it is clear Violation of Title 42 Section 704).

13. That you sent a letter addressed to his home address, begin with Dear Anthony (not Mr. Bayad), signed personally by and dated 21st of August 2000, personally congratulating Bayad for his individual contributions that have played a significant role in making Cisco fiscal year 2000 a success, and you gave Bayad Cisco Incentive Plan (CIP) Bonus for 5,858.05 in recognition of his accomplishments this year.(Exhibit 13 Attached a congratulation letter signed by chamber to Bayad)

14. That Cisco Director Sigrund Sheomaker and Cisco Area Manager Lynn Fraser rated Bayad ‘ Job performance a Scale of Letter “E” (means Employee (Bayad) is SUCCESSFUL; MEETS or EXCEEDED all key performance expectations; and their input summary Anthony (Bayad) has been successful at meeting his performance objectives for this period. He is always willing to do whatever it takes in order for the Team to

be Successful. (Exhibit 14 attached of Bayad Cisco job performance review)

15. That the same month **May, 2001** of Mr. Bayad 'termination of employment with Cisco, and on about May 30th of 2001, **Bruce Bastian** a Cisco **Manager** , sent a "**wicked racial Audio "via Electronic mail** within the authority of **Cisco Systems** 's way of mail communications, intentionally to Bayad's coworkers Amado Navas with Cisco Systems Inc., the directive audio was controlled with "**multifarious racial jokes**" about Bayad 's ineptitude to verbalize the expression of the English tongue, clearly ridicule Bayad and any **foreign nationals**, and sound stylish and **feebleminded** of the of English **palaver**, and relate to Bayad getting terminated and titled as Follow: **hate this "Fucking " job, and I will be fired; I have just been fired , and By-By- everybody; I need a "P" quick and my Etc...),** and it goes on and on, (Bruce Bastian is a *Friend of Cisco Manager Dale Ronowski and Friend of Cisco Director Savasatano, who travel from California to Tampa on many occasions at Cisco ' Expenses).*

Exhibit 15 attached to the complain as copy of the emails of Senior Vice President of Sales Rick J. Justice and a copy of the audio file stored in the CD containing multifarious sound as word perfect , click and listen.

16. That Global Internetworking Consulting is business partner with Cyberguard Inc.(Security specialized company), owned by Bayad a Moroccan and an American as you know , is also CISCO BUSINESS PARTNERS AND RESELLERS.
(Exhibit 16 attached is a letter of President Cyber guard welcoming Bayad and his company as partners and reseller and providing him a Plaque certifying Global Internetworking consultants as Cyberguard Certify Partner. YOU NEVER SENT A LETTER NOR ACKNOWLEDGE Bayad even though he is legally a Cisco Partner).

17. That you invested money in Sir Donald McKinney a white person

who founded the company called **International Networking Services** Located at 1213 Innsbruck Drive Sunnyvale , California, Zip Code 94089 , And was Acquired by Lucent Technologies for approximately 2 Billion Dollars. (Exhibit 17 attached)

18. That you do not invest money in Cisco Partners/Resellers as Bayad ‘Moroccan/American company or Companies of Arabs/American, African/American, or Spanish.

19. That you have a policy in place at Cisco to promote and give all Cisco sales leads to white persons founding and owning companies as **COLEMAN TECHNOLOGIES** Florida (you have certified 20 of their Engineers as Cisco CCIE Certify in short period of time), and made the company profitable because of your known policies of promoting only white and providing them your Sales Leads as result Coleman sold approaching to **20 millions worth of Cisco equipments**; and not **Bell South** an employer of more than 1000 Engineers and more than 1000 of Sale forces. (Exhibit 19 attached)

20. That you have implemented several policies in Cisco targeting Arabs/African/Spanish/ Indians (especially from India Bombay) called :

A. **NO-ARABS/AFRICANS/SPANISH/INDIANS-CCIE-LIST**, and Arab Americans as Bayad who has all the copies of the CCIE EXAM and you Failed him 10 times for the CCIE WRITTEN and 3 times for the CCIE PRACTICAL LAB.

B. **No-Hiring-List** policy that is put in place targeting all the NONE WHITE ENGINEERS from India-Asia and elsewhere and Arabs Americans as Bayad.

C. **CISCO EEO-RACE-IDENTIFICATION –LIST UNLAWFUL** Employment of Race Preferences and Practices that you call “**CISCO EEO (Equal Employer Opportunity) RACE IDENTIFICATION**”. (Exhibit 20 attached list of **NONE WHITE ENGINEERS** in

NO-HIRE-LIST and Cisco COPY OF EEO-RACE-IDENTIFICATION-LIST Letter

requesting Bayad to define his race and gender of his early Employment process with Cisco and even before a position was offered to him with Cisco).

21. That Cisco System Manager **Dale Ronowski** for Tampa , Florida , does not have a bachelors degree from College in Computer Engineering Technologies, nor he is a Proteon Certify, nor Bay Networks/Nortel Networks Certify, you and Savastano handed him the CCIE (Cisco Certify Internetworking Expert, and you and Savastano permitting him to violate Cisco Business code of Ethics and Conduct (please revise your Cisco Business of conduct), by **Not enforcing your Cisco Business of Conduct** to white employees as Dale Ronowski who engaged of humiliation and insult to Cisco Partner/Reseller Bell South its Engineers, whom are Blacks and Spanish by openly telling them that they were useless and stupid during a Cisco partner meeting in Tampa Florida office at the presence of white customers attending the same Meeting and he get reported to Cisco and for that, he gets promoted as you did with **Joe Rogers** also known as the Bleu eyes **Cisco SE Manager** of Tampa Office Who **sexually harass** his secretary and get reported but he **gets transferred to Cisco North Carolina** and now you promoted him as **Cisco director back to Tampa**, and you took no action against NONE of them and simply because they are **white** and one of them is a good Friend of your **friend** Savastano (Savastano **promoted** Dale Ronowski as Manager at Lucent and at Cisco and please Review Dale Ronowski Cisco personal records at your possession and will be asked to provide).(Exhibit 21 Cisco Business of Conduct).

22. That Bayad is an American born in Royal Kingdom of Morocco, a citizen of the United States of America, graduate from college with a GPA approaching 3.4 out of 4.0 scale, speaks Arabic, English, French, North African Dialect, is **Proteon Certify** of

the first company in the industry Proteon Inc, year 1995, Bay Networks/Nortel Networks certify (**fortune 500 company**), and **Cyber guard Security certify**, was given all the **copies of the CCIE Exams**, and **You failed him 10 times** for the Cisco Certification Internetworking Expert “CCIE” **Written Exam and 3 time** for Cisco CCIE practical Exam. (Exhibit 22 attached of records of Cisco failing Bayad 3 times, and for the 10 times please provide these records at your possession and with Silvia Prometric)

23. That Cisco Systems Engineer **World Wide Channels Michael Purcell** is **SIX TIMES CERTIFY** as Cisco Internetworking Expert :-1) **One time CERTIFY** CCIE for SNA/IP;2-) **Two Times CERTIFY** as CCIE for ISP; 3-) **Three time CERTIFY** as CCIE for SECURITY;4-) **Four Times CERTIFY** as CCIE FOR COMMUNICATION; 5-) **Five times CERTIFY** as SERVICES; and 6-) **Six times CERTIFY** as CCIE for VOICE ; and also another white person **Greg Gall Senior** Systems Engineering Mgr, **WorldWide channels Operations** is a CCIE, CCNP (Cisco Certify Network Professional), CCDP (Cisco Certify Design Expert Professional), and CCDA (Cisco Certify Design Associate); and another two white persons and very close friends of Savastano your Vice President of Finance, **Dale Ronowski and Bruce Brewer are CCIE**. (Please see their records as you will provide them)

24. That you are in agreement with Bayad based of all the facts introduced in this litigationthat your two policies **CISCO EEO-RACE-IDENTIFICATION -LIST and NO-HIRE-LIST** are re-enforced by Cisco and working against Minorities , as it was proven when Bayad applied of **multitude employment** opportunities within Cisco Systems Inc., and noted as “**Cisco requisition**”; 1) **Requisition 714007** contact name Michael Kent, 2) **Requisition 713667** contact name Niki Peleuses,3) **Requisition 713906** contact name Michael Kent,4) **Requisition 713644** contact name Niki Peleuses, 5) **Requisition 713123** contact Michael Kent, 6) **Requisition**

711846 contact name Chuck Ramsburg, 7) Requisition 711780 contact Domick Delfino, 8)
Requisition 72133 contact Scoot Lovett, 9) Requisition 712669 Michael Kent, 10) and
Requisition 713950 Liz Bacchi, and many more. (Exhibit 24 attached of the correspondence of
Cisco Managers and all the requisition of **opportunities with Cisco Systems Inc.**

25. That your records indicate you hold an **Honorable Jurist Degree**
(Law degree) and you understand the law of this land and you cannot deny that in America and
elsewhere in the world and under the law of this land , there is one existing class of Citizens and
Classification base on Origin, Race, Gender, Religion and Sex is against our fundamental and
our United State Constitution and our State laws ad Federal Court has Jurisdiction; Destroying
Evidence in Federal Proceeding is a crime and you may be subject in CONTEMPT with the
Court and default judgment may entered against you; engaging in trade and patent secret by
employing Wiese a Vice President of "Product" from a competitor of Cisco, the Company as
AVAYA is Patent infringement as you are being sued in Texas at this present time, and Hiring
Savastano Lucent Vice President of Finance and now Cisco, an Executive who has worked for
three companies and also a **SHARE HOLDER** of three companies LUCENT
TECHCHNOLOGIES <AVAYA INC>, and **CISCO CYSTEMS**, this engagement is violation
of inside trade of the Security Exchange Commissions ;Savastano is aware of the financial record ,
business projection , and the next move of 3 companies AT&T, Cisco, Lucent, and AVAYA.
(See **Exhibit 25** of communication of Cisco Ethic Officer Direction ~~to~~ Cisco Employee to Destroy
Evidence of an Exhibit attached to Bayad Complaint and Cisco 'Counselor Piper Rudnick Law
Firm acknowledging the fact that companies as Cisco are prohibited from destroying Evidence
and are subject of Default and Sanctions). .